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April 10, 2015

Ms Dorinda J. Folse
Area Director
Occupational Safety and Health Administration
Baton Rouge Area Office
9100 Bluebonnet Centre Blvd.
Suite 201
Baton Rouge, LA 70809

RE: OSHA Activity No. 973450

Dear Ms. Folse,

As counsel for REG Geismar, L L.C. ("REG"), the following information is provided in response to OSHA's letter requesting information on the incident and injuries that occurred to two workers, Messrs (b) (6) and (b) (6), on Thursday April 2, 2015

Name of injured worker:	(b) (6)	(b) (6)
Usual job title:	Shift Supervisor	Process Operator
Job at time of incident:	Shift Supervisor	Process Operator
Type of employment	Full-time	Full-time
Amount of time with company	5 years and 3 months	3 years and 4 months
Amount of time in current position at time of incident:	1 year and 6 months	3 years and 4 months
Description and severity of the injury	Second and third degree burns to left arm and right hand	First and second degree burns on face and hands
Date and time of incident:	Thursday April 2, 2015 at approximately 6:24pm	
Location of incident:	REG Geismar Hydrodeoxygenation (HDO) Area	

On Thursday April 2, 2015, operations personnel, pursuant to established start-up procedures, were in the process of re-starting the Hydrodeoxygenation (HDO) recycle pump to re-establish circulation through the HDO reactors That pump was out of service for repairs to a pin hole leak in the balance line. The purpose of the balance line is to balance pump impellor thrust during pump operation. As additional maintenance, the inboard seal was also replaced while the pump was down for repair REG personnel performed the normal procedures to isolate the pump to allow the pump to be worked on safely and all repair work on the pump was completed by contract maintenance personnel on April 1, 2015. Established steps necessary to verify pump integrity, such as pump alignment, pump vibration testing, pressure testing, and valve line-ups were performed per established procedure and met all specifications The established start-up procedures were followed to bring the pump back into service.

Operation of the HDO recycle pump is necessary for production of renewable hydrocarbon diesel The HDO recycle pump is a tandem seal multi-stage 150 HP centrifugal pump that circulates

renewable diesel blend stock from the hot separator back to the HDO reactors. The purpose of recirculation is to maintain process temperature control in the HDO reactors. The operating pressure and temperature of the HDO recycle pump is 450 degrees F and 1950 psig respectively.

At approximately 6 24pm a fire occurred at the HDO recycle pump According to eye witness accounts, fire was observed coming from the inboard seal area, between the gear box and pump housing At the time of the incident the process temperature and pressure were approximately 250 degrees F and 1824 psig respectively. Reports indicate the fire formed rapidly and there was no visible release of liquid prior to the fire The shift supervisor, (b) (6) , was standing next to the pump at the time of the fire. He was in the process of closing a valve used during start-up A process operator, (b) (6) , was also next to the pump at the time of the fire. He was in the process of opening valves per the operating procedure Several other operators and maintenance personnel were in the area of the pump at the time of the fire. One process operator fell trying to exit the area and reported knee pain, but after medical evaluation required ~~no~~ medical treatment. All other personnel were able to exit the area without injury.

Operations personnel reacted quickly to complete emergency shutdown procedures. Plant deluge and fire monitors were activated to control flame spread and cool adjacent equipment Emergency response notification occurred via Community Awareness and Emergency Response (CAER) radio communications and responders quickly arrived at the facility to assist with efforts to isolate and extinguish the fire. Ambulances arrived for transport of the two injured employees to a local hospital As a result of the fire, adjacent piping and equipment was compromised, resulting in additional fire REG personnel established incident command and worked closely with Geismar Area Mutual Aid (GAMA) to complete isolation of remaining process equipment and extinguishment of residual fire The fire was extinguished at approximately 11:03pm. An all clear was announced at approximately 11:25pm

Forensic evaluation of the pump is necessary to complete the causal factor analysis and determine what corrective actions are necessary. However, at this juncture, REG has undertaken efforts to determine causative factors, has isolated the HDO recycle pump as the ignition source, and will need to understand what caused the pump failure in order to determine the root cause of this fire and ascertain what corrective actions would be necessary for future use of the same pump. Due to the likely litigation that will result from this incident, insurance representatives and interested third parties will need to be notified and given the opportunity to be present for any forensic testing. REG has secured the pump and will undertake the forensic evaluation as soon as practicable.

Based on information gathered in the course of REG's investigation, including interviews of personnel and historical trending of pump monitoring parameters, it appears that this incident resulted from a failure related ~~to the inboard seal~~ on this pump and that a new pump will be an effective corrective action Due to prior reliability issues, REG had purchased a pump of an alternative design to increase reliability ~~In addition, the new pump~~ does not include external seals which should minimize the possibility of fire related to external seals The new pump will be installed after the necessary mechanical engineering is complete. REG will not start the new pump or HDO process until it has evaluated the integrity and safety of the new pump.

The description provided above is based upon interviews with eye witnesses and other plant and contract personnel A total of 16 individuals were interviewed. eight process operators, one

operations supervisor, one shift supervisor, four contract maintenance personnel, one mechanical engineer, and plant manager. All personnel working around the pump at the time of incident, and contract maintenance personnel, who performed work on the pump, were included in the interview process.

The company is committed to determining underlying reasons the incident occurred and implementing the necessary measures to prevent similar incidents in the future As noted, an alternative design HDO recycle pump has been purchased. The alternative design does not contain seals and is expected to reduce potential for loss of process containment. Engineering for installation of the replacement HDO recycle pump is in progress and installation will occur prior to start-up

With an expression of my personal and professional respect, I remain,

Sincerely,

ADAMS AND REESE, LLP

Scott E Delacroix

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Attachment B